

Report Phase Consultation Responses



P393 'Disapplication of Supplier Charge SP01'

This Report Phase Consultation was issued on 14 October 2019, with responses invited by 30 October 2019.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
Npower Group	Supplier, Supplier Agent
Power Data Associates Ltd	Supplier Agent
Scottish Power	Supplier
SmartestEnergy	Supplier
SSE Electricity Ltd and SSE Energy Supply Ltd	Supplier, Supplier Agent (SSE Metering Ltd)

P393
Report Phase Consultation
Responses

4 November 2019

Version 1.0

Page 1 of 8

© ELEXON Limited 2019

Question 1: Do you agree with the Panel's initial unanimous recommendation that P393 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
Npower Group	Yes	Moving money between competitors for what is a not material breach of the code is an uncompetitive arrangement, we support approval of this modification.
Power Data Associates Ltd	Yes	(c) & (d) by promoting the submission of actual data. The effect of the SP01 charges is minimising the impact of the SP08 performance measures
Scottish Power	Yes	-
SmartestEnergy	Yes	We agree that the lack of submission does not affect other parties and that therefore it is inappropriate to collect and redistribute the SP01 charges.
SSE Electricity Ltd and SSE Energy Supply Ltd	Yes	We support implementation of P393. We agree that it better facilitates Applicable Objectives C and D by removing SP01 Supplier Charge, which doesn't align with the principle of Supplier Charges and makes the BSC Supplier Charge technique more efficient as a result.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P393?

Summary

Yes	No	Neutral/No Comment	Other
4	0	1	0

Responses

Respondent	Response	Rationale
Npower Group	Yes	-
Power Data Associates Ltd	Yes	-
Scottish Power	Yes	-
SmartestEnergy	No comment	-
SSE Electricity Ltd and SSE Energy Supply Ltd	Yes	-

Question 3: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
Npower Group	Yes	-
Power Data Associates Ltd	Yes	-
Scottish Power	Yes	-
SmartestEnergy	Yes	-
SSE Electricity Ltd and SSE Energy Supply Ltd	Yes	-

Question 4: Do you agree with the Panel's initial view that P393 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
4	0	1	0

Responses

Respondent	Response	Rationale
Npower Group	Yes	This modification impacts competition within the market.
Power Data Associates Ltd	Neutral	No particular view
Scottish Power	Yes	-
SmartestEnergy	Yes	-
SSE Electricity Ltd and SSE Energy Supply Ltd	Yes	-

Question 5: Will P393 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
1	4	0	0

Responses

Respondent	Response	Rationale
Npower Group	No	No activities required to implement.
Power Data Associates Ltd	No	As a PAB member I can see the focus on SP01 is negating the impact of SP08
Scottish Power	No	-
SmartestEnergy	No	-
SSE Electricity Ltd and SSE Energy Supply Ltd	Yes	We note that there will no longer be a requirement to pay SP01 charges and therefore also no more redistribution of this charge. There may be some internal system and process changes required around this. It's difficult to know whether there will be any other impact.

Question 6: Will your organisation incur any costs in implementing P393?

Summary

Yes	No	Neutral/No Comment	Other
0	5	0	0

Responses

Respondent	Response	Rationale
Npower Group	No	-
Power Data Associates Ltd	No	-
Scottish Power	No	-
SmartestEnergy	No	-
SSE Electricity Ltd and SSE Energy Supply Ltd	No	We do not anticipate any costs in implementing P393.

Question 7: Do you have any further comments on P393?

Summary

Yes	No
1	4

Responses

Respondent	Response	Rationale
Npower Group	Yes	Creating a DPI file should be relatively simple for a domestic supplier which has a small number of preferred national agents, however for an I&C supplier that needs to manage a wide number of customer appointed agents it becomes significantly more challenging. Further, there are known BSC issues for suppliers in managing customer appointed agents, a solution to which has not yet been agreed.
Power Data Associates Ltd	No	-
Scottish Power	No	-
SmartestEnergy	No	-
SSE Electricity Ltd and SSE Energy Supply Ltd	No	-